

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Alexandria Division)

UNITED STATES OF AMERICA,

v.

RAHEEM OLIVER,

Defendant.

No. 1:18-cr-00009-CMH-1

**DEFENDANT’S REPLY IN SUPPORT OF MOTION TO DELAY REPORT DATE
TO BUREAU OF PRISONS UNTIL NOVEMBER 30, 2018**

Defendant Raheem Oliver moved the Court to delay his report date to the Bureau of Prisons to begin service of his sentence from September 20, 2018, until on or after November 30, 2018. Dkt. 32.

The government opposed this motion for two primary reasons. Dkt. 33, at 2. **First**, the government claimed that Mr. Oliver is a flight risk. Mr. Oliver is not a flight risk. He has appeared for all hearings in this matter and traveled from out of state to do so. In addition, he appeared for his change-of-plea hearing in California federal court on September 17, 2018. The government makes much of a quote in Mr. Oliver’s PSR that “I’ve got to get out of town.” But the government neglects to mention that this statement was supposedly made *in July 2003, over 15 years ago*. Given that Mr. Oliver has not given any indication of being a flight risk in this case nor within the last 15 years, this reason should be rejected.

Second, Mr. Oliver’s sentencing in the California case is set for November 13, 2018. As a result, if this Court delays his report date, he will be able to prepare for that sentencing and appear without the expense of Bureau of Prisons having to transport him there, just a few weeks after his initial report date.

Third, the government contends that he is “an ongoing danger to the community each day that he remains at large.” *Id.* at 3. In support of that statement, the government offers a general description of supposed criminal conduct by Mr. Oliver. This description is not supported by any evidence, and Mr. Oliver has not been charged for any misconduct suggested by the government. As a result, this reason should be rejected as well.

In addition, Mr. Oliver stated in his motion that he needs dental work (two root canals) before he reports to Bureau of Prison. He is unsure if he will be able to get this necessary work done after he reports and wishes to have the work done before he reports.

Mr. Oliver respectfully requests that he be permitted to delay his report date to Bureau of Prisons until on or after November 30, 2018.

Dated: September 17, 2018

Respectfully submitted,

/s/ Sara E. Kropf
Sara E. Kropf (VA Bar No. 84931)
Law Office of Sara Kropf PLLC
701 8th Street, NW
Suite 300
Washington, DC 20001
(202) 627-6900
sara@kropf-law.com

/s/ Winston Kevin McKesson
Winston Kevin McKesson, Esq.
Law Office of Winston K. McKesson
6080 Center Drive #652
Los Angeles, CA 90045
(310) 242-5889
Winstonkevinmckesson0331@gmail.com

Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September 2018, the foregoing motion was served by electronic filing on all counsel of record through the Court's ECF system:

/s/ Sara E. Kropf
Sara E. Kropf (VA Bar No. 84931)